
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

Mag. No. 08-8015

JERROD JEFFRESS, TODD ROBINSON,
RICHARD DAVIS, GLENDA BLACKMON,
and TRAVIS LYNN

I, Brendon Murray, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

SEE ATTACHMENT A

I further state that I am a Special Agent with the United States Social Security Administration and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.



Brendon Murray, Special Agent
U.S. Social Security Administration

Sworn to before me and subscribed in my presence,
February 8, 2008, at Newark, New Jersey

HONORABLE MADELINE COX ARLEO
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

Count 1

From at least as early as on or about May 1, 2006, through in or about August 2007, in the District of New Jersey, and elsewhere, defendants JERROD JEFFRESS, TODD ROBINSON, RICHARD DAVIS, GLENDA BLACKMON, and TRAVIS LYNN did:

knowingly and intentionally conspire and agree with others to steal and convert to their own use property of the United States, namely United States Treasury checks to which they were not entitled, in the total approximate amount of \$30,783.38, contrary to Title 18, United States Code, Section 641.

In furtherance of the conspiracy and to effect its unlawful object, the following overt acts were committed in the District of New Jersey and elsewhere:

1. On or about November 18, 2006, defendant TRAVIS LYNN used a fraudulent Department of Defense identification card to cash a stolen United States Treasury check at a check cashing facility in Kearny, New Jersey.
2. On or about November 21, 2006, defendant RICHARD DAVIS used a fraudulent Department of Defense identification card to cash a stolen United States Treasury check at a check cashing facility in Kearny, New Jersey.
3. On or about November 22, 2006, defendant TODD ROBINSON used a fraudulent Department of Defense identification card to cash a stolen United States Treasury check at a check cashing facility in Kearny, New Jersey.
4. On or about December 19, 2006, defendant GLENDA BLACKMON used a fraudulent Middlesex County identification card to cash a stolen United States Treasury check at a check cashing facility in Matawan, New Jersey.

In violation of Title 18, United States Code, Section 371.

Count 2

On or about November 18, 2006, in the District of New Jersey and elsewhere, defendant TRAVIS LYNN knowingly possessed and used, without lawful authority, a means of identification of another person – that is, the name of M.T. on a Department of Defense identification card obtained in the name of M.T. – during and in relation to the theft of public money, a felony offense in violation of Title 18, United States Code, Section 641.

In violation of Title 18, United States Code, Section 1028A(a)(1).

Count 3

On or about November 21, 2006, in the District of New Jersey and elsewhere, defendant RICHARD DAVIS knowingly possessed and used, without lawful authority, a means of identification of another person – that is, the name of A.S. on a Department of Defense identification card obtained in the name of A.S. – during and in relation to the theft of public money, a felony offense in violation of Title 18, United States Code, Section 641.

In violation of Title 18, United States Code, Section 1028A(a)(1).

Count 4

On or about November 22, 2006, in the District of New Jersey and elsewhere, defendant TODD ROBINSON knowingly possessed and used, without lawful authority, a means of identification of another person – that is, the name of F.V. on a Department of Defense identification card obtained in the name of F.V. – during and in relation to the theft of public money, a felony offense in violation of Title 18, United States Code, Section 641.

In violation of Title 18, United States Code, Section 1028A(a)(1).

Count 5

On or about December 19, 2006, in the District of New Jersey and elsewhere, defendant GLENDA BLACKMON knowingly possessed and used, without lawful authority, a means of identification of another person – that is, the name of E.T. on a Middlesex County identification card obtained in the name of E.T. – during and in relation to the theft of public money, a felony offense in violation of Title 18, United States Code, Section 641.

In violation of Title 18, United States Code, Section 1028A(a)(1).

ATTACHMENT B

I, Brendon Murray, a Special Agent with the Social Security Administration, Office of the Inspector General, having conducted an investigation, and having spoken with other individuals, have knowledge of the following facts:

1. I have been involved in the investigation of JERROD JEFFRESS, TODD ROBINSON, RICHARD DAVIS, GLENDA BLACKMON, and TRAVIS LYNN for activities related to a scheme to steal monies from the United States Government by tendering stolen United States Treasury checks. The investigation has revealed that from on or about May 1, 2006 through in or about August 2007, defendants acquired United States Treasury checks and later attempted to negotiate those checks using fraudulent identification documentation. To effectuate the scheme, defendants obtained fraudulent identification documents – including counterfeit Department of Defense identification cards – that matched the name of the payee on the Treasury checks, but depicted a photograph of the defendant who negotiated the check.
2. The investigation has revealed that defendant JERROD JEFFRESS recruited defendants TODD ROBINSON, RICHARD DAVIS, GLENDA BLACKMON and TRAVIS LYNN to cash stolen United States Treasury checks in exchange for a portion of the check proceeds. In furtherance of this scheme, defendant JEFFRESS created and/or assisted defendants ROBINSON, DAVIS, BLACKMON and LYNN in creating fraudulent identification documentation. Defendants then attempted to negotiate the stolen Treasury checks at various check-cashing services in Hudson County, New Jersey, and elsewhere. In the course of this scheme, defendants attempted to negotiate United States Treasury checks to which they were not entitled, in the total approximate amount of \$30,783.38.
3. For example, on or about November 18, 2006, defendant TRAVIS LYNN tendered Treasury Check # 2052 25844470 at a check cashing business in Kearny, New Jersey. The check was made payable to M.T. in the approximate amount of \$1,715. LYNN negotiated the check by presenting a fraudulent Department of Defense identification card bearing the name of the payee, M.T., but depicting a photograph of LYNN. On or about August 13, 2007, defendant TRAVIS LYNN admitted to law enforcement authorities, in substance and in part, that he had used fraudulent identification documents to cash stolen United States Treasury checks.
4. On or about November 21, 2006, defendant RICHARD DAVIS tendered Treasury Check # 2052 25844486 at a check cashing business in Kearny, New Jersey. The check was made payable to A.S. in the approximate amount of \$1,297. DAVIS negotiated the check by presenting a fraudulent Department of Defense identification card bearing the name of the payee, A.S., but depicting a photograph of DAVIS.
5. On or about November 22, 2006, defendant TODD ROBINSON tendered Treasury Check # 2052 25844485 at a check cashing business in Kearny, New Jersey. The check was made payable to F.V. in the approximate amount of \$977. ROBINSON negotiated the check by presenting a fraudulent Department of Defense identification card bearing the name of the payee, F.V., but depicting a photograph of ROBINSON.

6. On or about December 19, 2006, defendant GLENDA BLACKMON tendered Treasury Check # 2052 27183266 and Treasury Check # 2052 27183267 at a check cashing business in Matawan, New Jersey. The checks were made payable to E.T. in the approximate amounts of \$1,052 and \$375, respectively. BLACKMON negotiated these checks by presenting a fraudulent Middlesex County identification card in the name of E.T., but depicting a photograph of BLACKMON. On or about December 19, 2006, defendant BLACKMON admitted to law enforcement authorities that she attempted to cash these Treasury checks using fraudulent identification documents.
7. On or about April 25, 2007, defendant JERROD JEFFRESS admitted to law enforcement authorities, in substance and in part, that he stole checks from residential mailboxes. JEFFRESS further admitted, in substance and in part, that he recruited other individuals to cash those checks in exchange for a portion of the check proceeds, that he assisted in creating fraudulent identification to be used to cash the checks, and that he transported the individuals to various check cashing services in New Jersey.
8. Defendants TODD ROBINSON, TRAVIS LYNN, GLENDA BLACKMON and RICHARD DAVIS each attempted to cash stolen United States Treasury checks using counterfeit county identification cards for several different counties in New Jersey that appeared to derive from the same source. Even though these fraudulent county identification cards were purportedly from several different counties, each bore the same purported signature of a County Clerk Authorized Deputy. Similarly, defendants TODD ROBINSON, TRAVIS LYNN and RICHARD DAVIS used counterfeit Department of Defense identification cards that appeared to derive from the same source and that each represented that the person identified held the rank of E4 in the United States Navy.
9. At all times relevant to this Complaint, the names printed on the fraudulent identification documents used to match the payees on the stolen Treasury checks constituted "means of identification of another" within the meaning of Title 18, United States Code, Sections 1028A(a)(1) and 1028(d)(7).